CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—LOS ANGELES REGION

101 CENTRE PLAZA DRIVE MONTEREY PARK, CA 91754-2156 (213) 266-7500

July 3, 1991

Ms. Nicole Jafari Stoody Company P.O. Box 1901 Industry, CA 91749-1901

REVIEW OF ADDITIONAL SUBSURFACE INVESTIGATION REPORT (FILE NO. 105.0263)

Four copies of a report titled "Additional Subsurface Sump and Clarifier Investigation" were received by this Regional Board on April 18, 1991. Upon review by staff, the following comments pertain:

- 1. Up to percentage level of total petroleum hydrocarbons (TPH) was found near the underground clarifier. Elevated concentrations of various volatile organic compounds (VOC) were also detected down to 30 feet below ground surface (bgs) in that area. These results, combined with those from a previous study, are evidence that the subject industrial waste clarifier is a source of subsurface contamination.
- 2. Up to 410 $\mu g/kg$ of total 1,2-dichloroethene, 170 $\mu g/kg$ of PCE and elevated concentrations of various VOC and TPH were found in soil samples down to 30 feet bgs adjacent to a backfilled sump in the former hazardous chemical storage area. These results and those from a previous study confirmed discharge of contaminants to the subsurface from the sump and the surrounding area.
- 3. Copper and nickel were detected above the Total Threshold Limit Concentrations (TTLC) at 1 foot bgs in both of these source areas. The vertical extent of heavy metal contamination remains to be determined.

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You are now required to accomplish the following tasks:

A. Soil Remediation

Board staff have no objection to the proposed clarifier and sump removal and remedial excavation in the vicinities of the sources. However, a detailed remedial action plan including proposed cleanup levels and confirmatory sampling scheme must be submitted for approval.

B. Cessation of Illegal Discharge and Subsurface Investigation

During recent site visits by Board staff, the following problem areas were noticed:

- 1. Aboveground clarifier. Heavy stains were found near the concrete structure which indicated discharge to the ground.
- 2. Aboveground piping feeding the clarifiers. On February 1, 1991, milky white liquid was observed being discharged to the ground and eventually to a storm drain inlet on site from a PVC pipe connecting to the underground clarifier. Stains on the ground in the vicinity and near the storm drain grate were evidence of previous discharges.
- 3. Discharge from cooling system and other activities in the yard. Oils and an unidentified liquid leaking from a cooling system were observed on the ground near the sheltered area in the yard.

You must cease these practices and perform adequate investigation to define the impact to the subsurface.

C. Site Re-inspection

A re-inspection of the subject site with representative from your company must be scheduled to assess various industrial activities performed both in- and outside of the building. Additional investigation may be required.

D. Continue Ground Water Quarterly Monitoring

The second quarterly ground water monitoring report due June 1, 1991 has not been received by this office to date. For you to avoid an administrative civil liability assessment, four copies of the ground water monitoring report must be received by this office on or before July 22, 1991.

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Four copies each of a remedial action plan for the clarifier and sump areas, and a discharge cessation/investigation plan are due to this office by August 9, 1991. The re-inspection must also be scheduled before that date.

Please contact Samuel Yu of our staff at (213)266-7541 if you have any questions, and address all correspondence to his attention.

ROÝ Ř. SAKAIDA

Senior Water Resource

Control Engineer

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